

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

IN RE:)
) Case No. 24-60212
HUNTER W. SMITH,)
)
Debtor)

UNITED STATES' RESPONSE
TO THE TRUSTEE'S OBJECTION TO CLAIMS

The United States of America on behalf of the Small Business Administration (SBA) responds to the Trustee's objection to the proofs of claim filed by the SBA as follows:

The SBA filed two proofs of claim. Proof of Claim 6 relates to a note procured by one of Debtor's limited liability companies, Champion Brewing Company, LLC, in the amount of \$486,627.89. Proof of Claim 7 relates to a note procured by another of Debtor's limited liability companies, Paper Canoe LLC, in the amount of \$ 101,976.35. The original proofs of claim documented the notes. The Trustee objected to these proofs of claim, stating that the notes are against LLCs, and the SBA did not include any evidence that Debtor had personally guaranteed the notes.

In response, the SBA filed an amended Proof of Claim 6 to document that the Debtor personally guaranteed the note against Champion Brewing Company, LLC, in the amount of \$486,627.89. *See* Claim 6-2, SBA Amended Proof of Claim filed March 17, 2025. The SBA agrees that the Trustee's objection regarding Proof of Claim 7 is well taken.

Undersigned counsel has communicated this information to the Trustee, and the parties plan to prepare an order to resolve the objection prior to the hearing currently scheduled on April 9, 2025.

Respectfully submitted,

ZACHARY T. LEE
Acting United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2025, have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Andrew S. Goldstein, Esq.
United States Chapter 7 Trustee

/s/ G. Riley Worrell
G. Riley Worrell
Assistant United States Attorney